

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

BRIAN MILLER, *et al.*,  
Plaintiffs,

v.

COMPUTER SCIENCES CORPORATION,  
Defendant.

Civil Action No. 05-010-JJF

**DEFENDANT'S PROPOSED SPECIAL VERDICT FORM**

Defendant, Computer Sciences Corporation ("CSC"), by and through its undersigned counsel, respectfully submits the following proposed special verdict form pursuant to Local Rule 51.1.

**SPECIAL VERDICT FORM**

**QUESTION NO. 1:**

Do you find that Plaintiffs have proven by the preponderance of the evidence that AMIP bonuses constitute "wages" under the Delaware Wage Payment and Collection Act?

Please Answer Yes or No: \_\_\_\_\_

*If you answered "NO," please skip the remainder of the questions.*

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**QUESTION NO. 2:**

If you answered "Yes" to Question No. 1, do you find that Plaintiffs have proven by the preponderance of the evidence that they were enrolled in AMIP for Fiscal Year 2004?

Please Answer Yes or No: \_\_\_\_\_

*If you answered "YES," please skip the below question and go directly to Question No. 3.*

**Question No. 2A:**

If you answered "No," do you find that Plaintiffs could have earned an AMIP bonus for Fiscal Year 2004 even if they were not enrolled in AMIP for that year?

Please Answer Yes or No: \_\_\_\_\_

*If you answered "NO," please skip the remainder of the questions.*

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**QUESTION NO. 3:**

If you answered "Yes" to Question No. 2 or 2A, do you find that Plaintiffs have proven by the preponderance of the evidence that they were subject to specific AMIP objectives, targets and weightings for Fiscal Year 2004?

Please Answer Yes or No: \_\_\_\_\_

*If you answered "YES," please skip the below question and go directly to Question No. 4.*

**Question No. 3A:**

If you answered "No," do you find that it was necessary for Plaintiffs to be subject to specific AMIP objectives, targets and weightings in order to earn an AMIP bonus that year?

Please Answer Yes or No: \_\_\_\_\_

*If you answered "YES," please skip the remainder of the questions.*

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**QUESTION NO. 4:**

If you answered "Yes" to Question No. 3 or "No" to Question 3A, do you find that Plaintiffs have proven by a preponderance of the evidence that they were still in AMIP at the close of Fiscal Year 2004?

Please Answer Yes or No: \_\_\_\_\_

*If you answered "YES," please skip the below question and go directly to Question No. 5.*

**Question No. 4A:**

If you answered "No," do you find that it was necessary for Plaintiffs to still be in AMIP in order to earn an AMIP bonus that year?

Please Answer Yes or No: \_\_\_\_\_

*If you answered "YES," please skip the remainder of the questions.*

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**QUESTION NO. 5:**

If you answered "Yes" to Question No. 4 or "No" to Question 4A, do you find by the preponderance of the evidence that Plaintiffs are entitled to some portion of an AMIP bonus for Fiscal Year 2004?

Please Answer Yes or No: \_\_\_\_\_

*If you answered "NO," please skip the remainder of the questions.*

**Question No. 5A:**

If you answered "Yes," please list the amount that you believe each Plaintiff is entitled to, if any:

Brian Miller	_____
Hector Calderon	_____
Charles Folwell	_____
Dawn M. Hauck	_____
Kevin Keir	_____
Ashby Lincoln	_____
Karen Masino	_____
Robert W. Peterson	_____
Susan Pokoiski	_____
Dan P. Rollins	_____
William Sperati	_____

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Date

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FOREPERSON

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**CERTIFICATE OF SERVICE**

I hereby certify that on July 10, 2006, the attached document was hand delivered to the following attorney of record and was electronically filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following and the document is available for viewing and downloading from CM/ECF:

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